

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK - - - -  
THE ABRAMSON LAW GROUP, PLLC,

Plaintiff,

24 Civ. 5750 [AT]

-against-

**ORDER TO SHOW CAUSE**

CARDEA CAPITAL GROUP, INC.,  
CARDEA CAPITAL ADVISORS, LLC,  
CARDEA CORPORATE HOLDINGS, INC.  
AND CARDEA HOLDINGS USA, LLC,

Defendants.

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UPON the Declaration of Brian Reichberg dated June 14, 2025 and the exhibits thereto, the Declaration of Peter M. Levine dated June 16, 2025, and all prior proceedings had herein; and

IT BEING ALLEGED:

A. Plaintiff, The Abramson Law Group, PLLC, commenced this action July 30, 2024 by filing a Complaint to recover unpaid legal fees allegedly owed by defendants Cardea Capital Group, Inc., Cardea Capital Advisors, LLC, Cardea Corporate Holdings, Inc., and Cardea Holdings USA, LLC;

B. Plaintiff predicated subject matter jurisdiction upon diversity of citizenship under 28 U.S.C. § 1332(a);

C. Plaintiff is a citizen of the State of New York;

D. Defendant Cardea Capital Advisors, LLC is a limited liability company, and when this action was commenced, one of its members, Brian Reichberg, was a citizen of the State of New York;

E. Brian Reichberg remains a citizen of the State of New York;

F. Brian Reichberg remains a member of Cardea Capital Advisors, LLC;

G. Cardea Capital Advisors, LLC is a citizen of the State of New York;

H. Defendants did not appear, answer, or otherwise move with respect to the Summons and Complaint;

I. On January 22, 2025, this Court directed the entry of a default judgment in favor of Plaintiff and against Defendants;

J. On January 22, 2025, a Judgment was entered by the Clerk of this Court in favor of Plaintiff and against Defendants in the principal amount of \$251,952.60, plus pre-judgment interest of \$16,922.94, plus costs of \$565;

K. Due to the lack of complete diversity of citizenship, this Court never had subject matter jurisdiction over this action and never had jurisdiction to direct the entry of a judgment in favor of Plaintiff and against Defendants;

L. Defendants had the right under Part 137 of the Rules of the Chief Administer of the New York Courts (22 N.Y.C.R.R. §137.0, et seq.) to elect to submit their fee dispute with Plaintiff to arbitration;

M. Plaintiff failed to provide Defendants with written notice of their right to submit the fee dispute to arbitration, and the Complaint fails to allege Plaintiff's compliance with Part 137;

LET plaintiff, The Abramson Law Group, PLLC, show cause before this Court at the United States Courthouse, 500 Pearl Street, Courtroom 15D, New York, New York 10007, on June \_\_, 2025 at \_\_\_\_\_, or as soon thereafter as counsel may be heard, why an order should not be made and entered under Rule 60(b)(4) and Rule 12(h)(3) of the Federal Rules of Civil Procedure:

1. declaring void and vacating the Judgment dated and entered January 22, 2025 in favor of plaintiff The Abramson Law Group, PLLC and against defendants Cardea Capital Group, Inc., Cardea Capital Advisors, LLC, Cardea Corporate Holdings, Inc., and Cardea Holdings USA, LLC;

2. vacating all restraints imposed upon Defendants' assets as a result of any action or proceeding commenced by Plaintiff to enforce the Judgment;
3. directing the return to Defendants of all funds collected by Plaintiff as a result of any action or proceeding commenced by Plaintiff to enforce the Judgment;
4. dismissing this action;
5. granting to Defendants such other, further, and different relief the Court deems just and proper; and it is further

ORDERED, that, sufficient cause appearing therefor, service of a copy of this Order to Show Cause and the papers upon which it is based shall be deemed sufficient if made by e-mail upon Plaintiff's counsel (Howard Wintner of The Abramson Law Group, PLLC [[hwintner@dsalaw.net](mailto:hwintner@dsalaw.net)]) on or before June \_\_, 2025; and it is further

ORDERED that answering papers, if any, shall be filed on the Official Court Electronic Document Filing System or before June \_\_, 2025; and it is further

ORDERED that reply papers, if any, shall be filed on the Official Court Electronic Document Filing System on or before June \_\_, 2025.

Dated: New York, New York  
June \_\_, 2025

E N T E R:

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United States District Judge